

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ANDY MARTIN,

Plaintiff,

v.

DANIEL AKERSON, CHARLENE
BARSHEFSKY, URSULA BURNS,
KENNETH CHENAULT, PETER
CHERNIN, JAN LESCHLY, RICHARD C.
LEVIN, RICHARD A. MCGINN,
EDWARD D. MILLER, STEVEN S.
REINEMUND, ROBERT D. WALTER,
RONALD A. WILLIAMS, "MR.
GUNNING," JUDY BISGARD,
AMERICAN EXPRESS CENTURION
BANK, AMERICAN EXPRESS BANK,
FSB,

Defendants.

Case No.: _____

FILED: JULY 3, 2008

08CV3812

JUDGE PALLMEYER

MAGISTRATE JUDGE KEYS

AEE

JOINT NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendants Daniel Akerson, Charlene Barshefsky, Ursula Burns, Kenneth Chenault, Peter Chernin, Jan Leschly, Richard C. Levin, Richard A. McGinn, Edward D. Miller, Steven S. Reinemund, Robert D. Walter, Ronald A. Williams, Vaughn Gunning (improperly named as "Mr. Gunning"), Judy Bisgard, American Express Centurion Bank, and American Express Bank, FSB (collectively, "Defendants"), by and through their undersigned counsel, jointly hereby give notice of the removal of the above-captioned action to this Court. In support of this Notice of Removal, Defendants state as follows:

1. On June 5, 2008, Plaintiff filed a Complaint in the Circuit Court of the Eighteenth Judicial Circuit In And For Dupage County, Illinois, titled *Andy Martin v. Daniel Akerson, et al.*, 2008-CH-002123 (“State Court Action”), raising claims relating to the alleged suspension of an account of Plaintiff.

2. A true and correct copy of the Complaint and all records and proceedings filed in the State Court Action are attached hereto as Exhibit A. A true and correct copy of the Docket Sheet in the State Court Action as of June 25, 2008, is attached hereto as Exhibit B.

3. Plaintiff is an individual who according to the Complaint is “based in Illinois, Florida, New York and worldwide.” Complaint at ¶ 1(b).

4. Defendants Daniel Akerson, Charlene Barshefsky, Ursula Burns, Kenneth Chenault, Peter Chernin, Jan Leschly, Richard C. Levin, Richard A. McGinn, Edward D. Miller, Steven S. Reinemund, Robert D. Walter, and Ronald A. Williams comprise the Board of Directors of American Express Company.

5. Defendants Vaughn Gunning (improperly named in the Complaint as “Mr. Gunning”) and Judy Bisgard are employees of a wholly-owned subsidiary of American Express Company.

6. Defendant American Express Centurion Bank is an industrial loan company and defendant American Express Bank, FSB is federal savings bank, both of which are indirect wholly owned subsidiaries of American Express Company.

7. This Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446(b) as it is filed “within thirty days after receipt by the defendant, through service or otherwise, of a copy of the initial pleading setting forth the claim upon which such action or

proceeding is based.” On or about June 5, 2008, Plaintiff sent via facsimile a copy of the Summons and Complaint to a wholly owned subsidiary of American Express Company.

8. This Court has original jurisdiction under 28 U.S.C. § 1331 as the Complaint raises claims that arise under the laws of the United States. Specifically, the Complaint asserts a claim under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq.; the Fair Debt Collection Practices Act, 15 U.S.C. §§ 1692-1692p; the Equal Credit Opportunity Act, 15 U.S.C. § 1691 et seq.; and the Fair Credit Billing Act, 15 U.S.C. § 1601. Plaintiff’s Complaint thus raises alleged violations of “federal law” and “federal consumer protection statutes.” Complaint at Count Three, ¶ 3.

9. Venue is proper in this Court because the action is being removed from the Circuit Court of DuPage County, Illinois.

10. This Court further has jurisdiction because the State Court Action appears to violate a permanent injunction issued by a United States District Court. The terms of the permanent injunction are set forth at *In re Martin-Trigona*, 592 F. Supp. 1566 (D. Conn. 1984), *aff’d*, 763 F.2d 140 (2d Cir. 1985), *cert. denied*, 474 U.S. 1061 (1986). The injunction requires that Plaintiff attach to any document that commences a new lawsuit in state court:

a statement entitled “Informational Statement Concerning Litigation History of Anthony R. Martin-Trigona, Pursuant to Court Orders,” whose text shall read as follows: “Pursuant to order of the United States District Court for the District of Connecticut and the United States Court of Appeals for the Second Circuit, this tribunal is respectfully referred to the litigation history of Anthony R. Martin-Trigona, described in *In re Martin-Trigona*, 573 F. Supp. 1245 (D. Conn. 1983), and *In re Martin-Trigona*, 737 F.2d 1254 (2d Cir. 1984), copies of which are attached hereto for ease of reference.” To this statement shall be attached the following material: (a) a copy of the opinion of this court

published at 573 F. Supp. 1245 (D. Conn. 1983), with all appendices; (b) a copy of the opinion of the Court of Appeals in *In re Martin-Trigona*, 737 F.2d 1254 (2d Cir. 1984), with all appendices; and (c) a copy of this order, *In re Martin-Trigona*, 592 F. Supp. 1566 (D. Conn. 1984), with appendices.

In re Martin-Trigona, 592 F. Supp. at 1573. Plaintiff failed to comply with these requirements. *See* Exhibit A.

11. Federal courts repeatedly have dismissed lawsuits filed in violation of the federal permanent injunction, including this Court's recent dismissal of an action filed by Plaintiff. *See Andy Martin v. David Brock, et al.*, Case No. 07-C-3154, United States District Court, Northern District of Illinois (Manning, J.), Docket Entries 16 and 24.

12. Written notice of filing of this Notice of Removal is being given to Plaintiff, and a copy is being filed in the Circuit Court of the Eighteenth Judicial Circuit in and for DuPage County, Illinois, as required by 28 U.S.C. § 1446(d).

13. All defendants named in this action join in this removal petition and thus jointly hereby seek removal of the State Court Action to this Court.

WHEREFORE, Defendants hereby remove the above-captioned matter from the Circuit Court of DuPage County to this Court.

AMERICAN EXPRESS CENTURION
BANK, AMERICAN EXPRESS BANK,
FSB, DANIEL AKERSON, *et al.*,
Defendants

By: /s/ Ruth A. Bahe-Jachna
One of Their Attorneys

Ruth A. Bahe-Jachna
Greenberg Traurig, LLP
77 West Wacker Drive, Suite 2500
Chicago, IL 60601
(p) (312) 456-8400
(f) (312) 456-8435
bahe@gtlaw.com

Louis Smith
Greenberg Traurig, LLP
200 Park Avenue, P.O. Box 677
Florham Park, New Jersey 07932-0677
(p) (973) 360-7900
(f) (973) 301-8410
smithlo@gtlaw.com

Attorneys for Defendants

Dated: July 3, 2008

CERTIFICATE OF SERVICE

I, Ruth A. Bahe-Jachna, an attorney, hereby certify that I caused a copy of the foregoing **JOINT NOTICE OF REMOVAL** to be served by email and by placing a true and correct copy in an envelope, with proper postage pre-paid, and addressed to:

Andy Martin
30 E. Huron St.
Suite 4406
Chicago, IL 60611-4723

e-mail: andymart20@aol.com

and depositing same in the U.S. mail at 77 West Wacker Drive, Chicago, Illinois 60601, before the hour of 5:00 p.m.

/s/ Ruth A. Bahe-Jachna
Ruth A. Bahe-Jachna

NJ 226425477v2 July 3, 2008

JUDGE PALLMEYER

MAGISTRATE JUDGE KEYS

AEE

EXHIBIT A

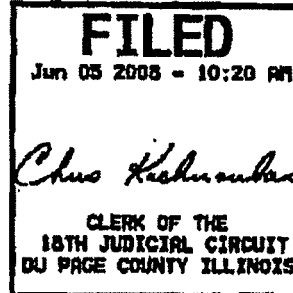
5350

UNITED STATES OF AMERICA
IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
IN AND FOR DUPAGE COUNTY, ILLINOIS

2008CH002123

Status Date: 10/02/08

Assigned To: 2005



ANDY MARTIN,

Plaintiff,

v.

IN CHANCERY

DANIEL AKERSON, CHARLENE
BARSHEFSKY, URSULA BURNS,
KENNETH CHENAULT, PETER
CHERNIN, JAN LESCHLY, RICHARD
C. LEVIN, RICHARD A. MCGINN,
EDWARD D. MILLER, STEVEN S.
REINEMUND, ROBERT D. WALTER,
RONALD A WILLIAMS, "MR.
GUNNING," JUDY BISGARD,
AMERICAN EXPRESS CENTURION
BANK, AMERICAN EXPRESS
BANK, FSB,

Defendants.

COMPLAINT

Preliminary Statement

Over the past twenty years consumer credit and credit card companies have sought to bar customer access to the judicial process. Instead, mega-corporations have sought to impose burdensome and complex arbitration procedures on their

customers. Congress has been virtually bribed to allow this unconscionable and abusive trend.

Congress has, however, developed an alternative series of consumer protection statutes: The Fair Credit Billing Act, the Fair Debt Collection Procedures Act, The Equal Credit Opportunity Act and the Fair Credit Reporting Act. Sadly, the American Express Company and its management appear to have developed systematic procedures to violate and ignore congressional enactments.

Usually, big companies such as American Express can "beat up" on their customers and customers lack the energy or resources to fight back. In this case, AmEx picked on a customer who had the means and experience to fight back. On information and belief this is the first state court to obtain jurisdiction over a lawsuit involving the mandatory arbitration provisions of AmEx's customer contract. Thus, this Court's decisions will lay the foundations for important new nationwide legal principles.

[COUNT ONE]

[ACTION TO INVALIDATE ARBITRATION CLAUSE OR COMPEL ARBITRATION]

1. Jurisdiction and venue

a. This court has general common law jurisdiction to hear and determine the matters presented.

b. Venue is proper in DuPage County. Plaintiff is based in Illinois, Florida, New York and worldwide, see AndyMartinWorldwide.com.

2. Factual allegations

a. The parties

A. Plaintiff has been a consumer advocate and public interest lawyer, although not a member of the Illinois Bar, who has exposed and fought corruption in Illinois politics and nationally for over forty years. Most recently, Plaintiff was a reform candidate for U. S. Senator. Plaintiff has been involved in important landmark consumer protection litigation, see Andymartin.com for a listing of important consumer precedents set by Plaintiff.

B. Defendants Akerson, Barshefsky, Burns, Chenault, Chernin, Leschly, Levin, McGinn, Miller, Reinemund, Walter and Williams are the senior managers of Amex.

C. Defendants "Gunning" (which may be a fictitious name used in violation of federal law) and "Bisgard" (which may also be a fictitious name used in violation of federal law) are allegedly AmEx employees in Arizona.

D. Defendants American Express Centurion Bank and American Express Bank are names disclosed by the defendants in the retaliation notices which they sent to Plaintiff on May 23, 2008 as "creditors" of Plaintiff.

b. The Facts Giving Rise to This Lawsuit

A. Plaintiff received a call from Gunning on or about May 13, 2008.

B. Gunning claimed that one of Plaintiff's accounts was \$21.14 past due, and that Gunning had suspended the account. Plaintiff was probably \$21.14 past due, as he has been somewhat slow to write checks during his most recent period of political activity.

C. When Plaintiff protested, Gunning said words to the effect of "then I'll cancel that account as well," and cancelled all of Plaintiff's accounts. Plaintiff has demanded a copy of the tape recording of the conversation, but defendants have refused to date to produce the tape between Gunning and Plaintiff.

D. Plaintiff uses Amex for automatic monthly billings on routine repetitive consumer transactions. The cancellation of Plaintiff's account has caused chaos and disruption, and required Plaintiff to redo accounts.

E. Plaintiff wrote to Bisgard and Chenault on May 13, and again on May 20, 2008. Bisgard and Chenault ignored Plaintiff's letters, thereby forcing the commencement of this lawsuit.

F. Plaintiff offered to pay his disputed balance into this Court's registry account, so that there would be no question over Plaintiff's ability and willingness to pay.

Bisgard ignored that offer and sent Plaintiff a computer message threatening to destroy Plaintiff's credit reputation.

G. American Express and its majordomo mandarin Chenault and his "board" of corporate cronies apparently do not respond to business letters. They require a lawsuit to be filed obtain their attention.

H. AmEx as imposed arbitration provisions on in its customers to deny them access to judicial remedies.

I. Plaintiff invoked the arbitration provisions of the contract but AmEx and its employees have ignored the remedial provisions of their own contract.

3. Legal claim

a. Plaintiff invoked the arbitration clause prepared by AmEx, by sending demands to Chenault and Bisgard (a copy of the Chenault letter).

b. Chenault, Bisgard and the Amex Corporation have ignored and violated their own contract and refused to engage in arbitration over this dispute.

c. In effect, AmEx has imposed an arbitration procedure on its customers as a form of in terrorem corporate intimidation, ignoring the contractual procedure when it is invoked by customers such as Plaintiff and hoping they will "go away."

4. Demand for judgment

Plaintiff sues and demands judgment as follows:

6

a. Declaratory and injunctive relief as may be necessary to do complete justice between the parties.

b. Ancillary money damages in an amount not to exceed \$60,000 on all counts, with the total recovery in this action limited to \$60,000.

c. Plaintiff sues, in the alternative, as to the arbitration clause of the contract between the parties. Plaintiff asks the Court to invalidate AmEx's arbitration clause so this lawsuit can proceed. Plaintiff believes mandatory arbitration clauses in consumer contracts reflect contracts of adhesion and are contrary to federal and state public policy. In the alternative, if the court upholds the arbitration clause, Plaintiff asks the court to compel the defendants to proceed with arbitration and to reinstate his accounts pendente lite.

[COUNT TWO]

[BREACH OF THE COMMON LAW COVENANT OF GOOD FAITH]

1-2. Plaintiff repeats and realleges Paragraphs 1-2 of Count One and further pleads:

3. Legal claim

a. The common law of Illinois and New York implies a covenant of good faith and fair dealing in every contract.

b. The actions of Gunning, Bisgard, Chenault and the senior management of Amex reflect arrogance and contempt for customers.

c. Calling a customer and saying you have suspended his account because he is \$21.14 past due, and then retaliating when the customer exercises his federally protected rights and protests, inflicting unnecessary chaos and disruption on the customer, reflect a gross absence of good faith and a clear violation of the common law covenant.

4. Demand for judgment

Plaintiff sues and demands judgment as follows:

a. Declaratory and injunctive relief as may be necessary to do complete justice between the parties.

b. Ancillary money damages in an amount not to exceed \$60,000 on all counts, with the total recovery in this action limited to \$60,000.

[COUNT THREE]

[BREACH OF FAIR CREDIT REPORTING ACT, FAIR DEBT
COLLECTION PROCEDURES ACT, EQUAL CREDIT
OPPORTUNITY ACT, FAIR CREDIT BILLING ACT]

1-2. Plaintiff repeats and realleges Paragraphs 1-2 of Count One and further pleads:

3. Legal claim

a. Congress has enacted a comprehensive series of federal consumer protection laws. Those laws bar retaliation for the invocation and exercise of consumer rights. The tape recording of the conversation between Gunning and Plaintiff will establish that Gunning called claiming he had suspended an

account for a \$21.24 past due amount. That was an obviously unbelievable claim.

b. It appears that Amex had obtained credit information about Plaintiff surreptitiously, in violation of federal law, and has to date failed to comply with federal law. AmEx appears to have systematic policies and procedures in place to knowingly and intentionally violate federal law in the manner in which Plaintiff was attacked and terrorized.

c. When Plaintiff exercised his rights pursuant to federal law to protest, Gunning immediately retaliated by canceling all of Plaintiff's accounts. Such retaliation is prohibited by and violated federal law. The defendants have failed to train and properly supervise Bisgard and Gunning to obey and comply with federal consumer protection statutes.

4. Demand for judgment

Plaintiff sues and demands judgment as follows:

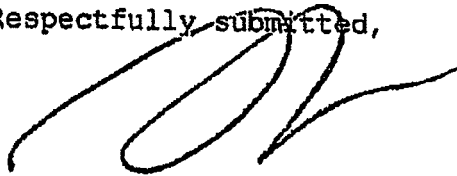
a. Declaratory and injunctive relief pursuant to federal law as may be necessary to do complete justice between the parties.

b. Ancillary money damages in an amount not to exceed \$60,000 on all counts, with the total recovery in this action limited to \$60,000.

Dated: June 5, 2008

9

Respectfully submitted,



ANDY MARTIN
SERVICE OF NOTICES IS RESPECTFULLY
REQUESTED BY FAX OR E-MAIL
30 E. Huron St., Suite 4406
Chicago, IL 60611-4723,
and
P. O. Box 1851
New York, NY 10150-1851
(please serve both addresses)
Toll-free tel. (866) 706-2639
Toll-free fax (866) 707-2639
E-mail: andymart20@aol.com (text only)

CIRCUIT COURT SUMMONS

3101 (Rev. 07/05)


STATE OF ILLINOIS ANDY MARTIN, PLAINTIFF VS. KENNETH CHENAULT, AMERICAN EXPRESS COMPANY, et al., DEFENDANT	UNITED STATES OF AMERICA IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT CASE NUMBER 2008CH002123	COUNTY OF DU PAGE File Stamp Here
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SUMMONS

To each defendant:
 You are summoned and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance in the office of the Clerk of this Court, 505 North County Farm Road, Wheaton, Illinois within 30 days after the service of this summons, not counting the day of service. **IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT.**

To the officer:
 This summons must be returned by the officer or other person to whom it was given for service, with endorsement of services and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so endorsed. This summons may not be served later than 30 days after its date.

WITNESS: CHRIS KACHIROUBAS, Clerk of the Eighteenth Judicial Circuit Court, and seal thereof at Wheaton, Illinois.

Date: June 5, 2008
 413
 BY Chris Kachiroubas
 Clerk of the Eighteenth Judicial Circuit


Name: Andy Martin ☒ PRO SE
 DuPage Attorney Number: _____
 Attorney for: Pro Se
 Address: 30 E. Huron Street, Suite 4408
 City/State/Zip: Chicago, IL 60611-4723
 Telephone: (888) 708-2638; Fax (888) 707-2639

NOTICE: The filing of an appearance or answer with the Circuit Court Clerk requires a statutory filing fee, payable at the time of filing.
 Date of Service: _____
 (To be inserted by officer on copy left with Defendant or other person.)

CHRIS KACHIROUBAS, CLERK OF THE 18TH JUDICIAL CIRCUIT COURT ©
WHEATON, ILLINOIS 60189-0707

CIRCUIT COURT SUMMONS


S101(Rav. 07/05)

STATE OF ILLINOIS IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT	UNITED STATES OF AMERICA COUNTY OF DU PAGE													
ANDY MARTIN, <div style="border: 1px solid black; padding: 5px; margin: 10px auto; width: 80%;"> PLAINTIFF VS. KENNETH CHENAULT, AMERICAN EXPRESS COMPANY, et al., DEFENDANT </div>	CASE NUMBER 2008CH002123	<div style="border: 1px solid black; height: 100px; width: 100%;"></div> File Stamp Here												
SUMMONS														
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WITNESS: CHRIS KACHIROUBAS, Clerk of the Eighteenth Judicial Circuit Court, and seal thereof at Wheaton, Illinois.														
Date <u>JUN - 5 2008</u>														
 Chris Kachirobas Deputy Clerk														
<table style="width: 100%;"> <tr> <td style="width: 50%;"> Name: <u>Andy Martin</u> </td> <td style="width: 50%; text-align: right;"> <input checked="" type="checkbox"/> PRO SE </td> </tr> <tr> <td colspan="2"> DuPage Attorney Number: _____ </td> </tr> <tr> <td colspan="2"> Attorney for: <u>Pro Se</u> </td> </tr> <tr> <td colspan="2"> Address: <u>30 E. Huron Street, Suite 4408</u> </td> </tr> <tr> <td colspan="2"> City/State/Zip: <u>Chicago, IL 60611-4723</u> </td> </tr> <tr> <td colspan="2"> Telephone: <u>(888) 706-2639; Fax (888) 707-2639</u> </td> </tr> </table>			Name: <u>Andy Martin</u>	<input checked="" type="checkbox"/> PRO SE	DuPage Attorney Number: _____		Attorney for: <u>Pro Se</u>		Address: <u>30 E. Huron Street, Suite 4408</u>		City/State/Zip: <u>Chicago, IL 60611-4723</u>		Telephone: <u>(888) 706-2639; Fax (888) 707-2639</u>	
Name: <u>Andy Martin</u>	<input checked="" type="checkbox"/> PRO SE													
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Date of Service: _____ (To be inserted by officer on copy left with defendant or other person.)														

CHRIS KACHIROUBAS, CLERK OF THE 18TH JUDICIAL CIRCUIT COURT @
 WHEATON, ILLINOIS 60189-0707

CIRCUIT COURT SUMMONS

3101 (Rev. 07/05)

UNITED STATES OF AMERICA IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT		COUNTY OF DU PAGE
ANDY MARTIN, <div style="border: 1px solid black; width: 150px; height: 100px; margin: 10px auto; position: relative;"> <div style="position: absolute; top: 0; right: 0;">PLAINTIFF</div> <div style="position: absolute; bottom: 0; left: 0;">DEPENDANT</div> </div>	CASE NUMBER <u>2008CH092123</u>	<div style="border: 1px solid black; width: 100%; height: 100%;"></div>
VS. KENNETH CHENAULT, AMERICAN EXPRESS COMPANY, et al.,		
SUMMONS		
<p>To each defendant:</p> <p>You are summoned and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance in the office of the Clerk of this Court, 505 North County Farm Road, Wheaton, Illinois within 30 days after the service of this summons, not counting the day of service. IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT.</p> <p>To the officer:</p> <p>This summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so endorsed. This summons may not be served later than 30 days after its date.</p>		
WITNESS: CHRIS KACHIROUBAS, Clerk of the Eighteenth Judicial Circuit Court, and seal thereof at Wheaton, Illinois.		
Date <u>JUN -- 5 2008</u>		
 Deputy Clerk		
Name: <u>Andy Martin</u> <input checked="" type="checkbox"/> PRO SE		
DuPage Attorney Number: _____		
Attorney for: <u>Pro Se</u>		
Address: <u>30 E. Huron Street, Suite 4406</u>		
City/State/Zip: <u>Chicago, IL 60611-4723</u>		
Telephone: <u>(866) 705-2639; Fax (866) 707-2639</u>		
Date of Service: _____ (To be inserted by officer on copy left with Defendant or other person.)		

CHRIS KACHIROUBAS, CLERK OF THE 18TH JUDICIAL CIRCUIT COURT ©
 WHEATON, ILLINOIS 60189-0707

3101(Rw. 07/05)

CIRCUIT COURT SUMMONS

STATE OF ILLINOIS UNITED STATES OF AMERICA COUNTY OF DU PAGE
IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT

ANDY MARTIN,

PLAINTIFF

vs.

KENNETH CHENAULT, AMERICAN
EXPRESS COMPANY, et al.,

DEFENDANT

-CASE NUMBER-
2008CH002123

File Stamp Here

SUMMONS

To each defendant:

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WITNESS: CHRIS KACHIROUBAS, Clerk of the Eighteenth
Judicial Circuit Court, and seal thereof at Wheaton,
Illinois.

Date

JUN - 5 2008



Chris Kachiroubas
413
Clerk of the Eighteenth Judicial Circuit

Name: Andy Martin ☒ PRO SE

DuPage Attorney Number: _____

Attorney for: Pro SeAddress: 30 E. Huron Street, Suite 4406City/State/Zip: Chicago, IL 60611-4723Telephone: (866) 706-2639; Fax (866) 707-2639

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Circuit Court Clerk requires a statutory filing fee, payable
at the time of filing.

Date of Service: _____
(To be inserted by officer on copy left with Defendant or other person.)

CHRIS KACHIROUBAS, CLERK OF THE 18TH JUDICIAL CIRCUIT COURT @
WHEATON, ILLINOIS 60189-0707

EXHIBIT B

Run Date 06/25/2008

Court File History
18th Judicial Circuit Court
Docket of CourtFile 2008CH002123

Page 1

Case Title: ANDY MARTIN -VS- DANIEL AKERSON
Assigned Location: 2005 Legal Status: ACTIVE Initiating Agency: CLERKS OFFICE

Parties

Name: KENNETH CHENAULT
Role: DEFENDANT

Name: CHARLENE BARSHIEFSKY
Role: DEFENDANT

Name: PETER CHERNIN
Role: DEFENDANT

Name: URSULA BURNS
Role: DEFENDANT

Name: JAN LESCHLY
Role: DEFENDANT

Name: RICHARD C LEVIN
Role: DEFENDANT

Name: RICHARD A MCGINN
Role: DEFENDANT

Name: EDWARD D MILLER
Role: DEFENDANT

Name: STEVEN S REINEMUND
Role: DEFENDANT

Name: RONALD A WILLIAMS
Role: DEFENDANT

Name: ROBERT D WALTER
Role: DEFENDANT

Run Date 06/25/2008

Court File History
18th Judicial Circuit Court
Docket of CourtFile 2008CH002123

Page 2

Name: AMERICAN EXPRESS BANK FSB
Role: DEFENDANT

Name: JUDY BISGARD
Role: DEFENDANT

Name: MR GUNNING GUNNING
Role: DEFENDANT

Name: AMERICAN EXPRESS CENTURION BANK
Role: DEFENDANT

Name: DANIEL AKERSON
Role: FIRST-NAMED DEFENDANT

Name: ANDY MARTIN
Role: FIRST-NAMED PLAINTIFF

Name: ANDY MARTIN
Role: PRO SE ATTORNEY
Address: 30 E. HURON ST, SUITE 4406
CHICAGO IL 60611

Count Number: 0001

Type of Case: CH0121 INJUNCTIONS (EXCEPT IN TAX & DIVORCE CASES)
Issuing Agency: CLERKS OFFICE Status: ACTIVE

06/05/2008 10200 FIRST-NAMED PLAINTIFF
First Name: ANDY Last Name: MARTIN

06/05/2008 10100 FIRST-NAMED DEFENDANT
First Name: DANIEL Last Name: AKERSON

06/05/2008 10010 ADDRESS

First Name: ANDY Last Name: MARTIN Address Type: HOME Address Line 1: 30 E. HURON ST, SUITE 4406 City: CHICAGO State: IL
Zip Code: 60611 Country Code: USA

06/05/2008 10330 PRO SE ATTORNEY
First Name: ANDY Last Name: MARTIN

Run Date 06/25/2008

Court File History
 18th Judicial Circuit Court
 Docket of CourtFile 2008CH002123

Page 3

06/05/2008 700210 CIVIL COUNT
 06/05/2008 2140 ORIGINAL LOCATION ASSIGNMENT
 New Location: 2005
 06/05/2008 5190 APPEARANCE
 First Name: ANDY Last Name: MARTIN Total Assessment Amount: \$175.00 For: ANDY MARTIN
 06/05/2008 5350 NEW CASE COMPLAINT/PETITION
 06/05/2008 4181 CIVIL CASE FILING ASSESSMENT
 06/05/2008 110 STATUS DATE
 Court Date: 10/02/2008 Court Location: 2005 Court Time: 09:05 AM Purpose Code: STATUS
 06/05/2008 6610 SUMMONS ISSUED
 06/05/2008 6610 SUMMONS ISSUED
 06/05/2008 9601 CIVIL FUND RECEIVED
 Allocated Amount: \$290.00
 06/05/2008 9700 APPLICATION OF FUND
 06/05/2008 9700 APPLICATION OF FUND
 06/05/2008 6610 SUMMONS ISSUED
 06/05/2008 6610 SUMMONS ISSUED
 06/05/2008 10110 DEFENDANT
 First Name: CHARLENE Last Name: BARSHERSKY
 06/05/2008 10110 DEFENDANT
 First Name: URSULA Last Name: BURNS
 06/05/2008 10110 DEFENDANT
 First Name: KENNETH Last Name: CHENAULT
 06/05/2008 10110 DEFENDANT
 First Name: PETER Last Name: CHERNIN
 06/05/2008 10110 DEFENDANT
 First Name: JAN Last Name: LESCHLY
 06/05/2008 10110 DEFENDANT
 First Name: RICHARD Middle Name: C Last Name: LEVIN
 06/05/2008 10110 DEFENDANT
 First Name: RICHARD Middle Name: A Last Name: MCGINN
 06/05/2008 10110 DEFENDANT
 First Name: EDWARD Middle Name: D Last Name: MILLER
 06/05/2008 10110 DEFENDANT
 First Name: STEVEN Middle Name: S Last Name: REINEMUND
 06/05/2008 10110 DEFENDANT
 First Name: ROBERT Middle Name: D Last Name: WALTER
 06/05/2008 10110 DEFENDANT

Run Date 06/25/2008

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First Name: RONALD Middle Name: A Last Name: WILLIAMS
06/05/2008 10110 DEFENDANT
Name Prefix: MR First Name: GUNNING Last Name: GUNNING
06/05/2008 10110 DEFENDANT
First Name: JUDY Last Name: BISGARD
06/05/2008 10110 DEFENDANT
Last Name: AMERICAN EXPRESS CENTURION BANK
06/05/2008 10110 DEFENDANT
Last Name: AMERICAN EXPRESS BANK FSB